

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 24-3161

UNITED STATES OF AMERICA,
Plaintiff-Appellee,

v.

ROMAN STERLINGOV
Defendant-Appellant.

**APPELLANT ROMAN STERLINGOV'S UNOPPOSED MOTION TO
MODIFY THE BRIEFING SCHEDULE**

Appellant Roman Sterlingov respectfully submits this unopposed proposed modified briefing schedule pursuant to Federal Rule of Appellate Procedure 26(b) for good cause shown. In support thereof, Appellant Sterlingov states:

1. On January 23, 2025, the Court entered a modified briefing schedule in this case. Doc ID 2096025. Appellant Sterlingov respectfully requests that the Court modify that briefing schedule as follows:

Event	Deadline
Appellant's Brief	June 16, 2025
Appellant's Appendix	June 16, 2025
Appellee's Brief	July 16, 2025
Appellee's Supplemental Appendix	July 16, 2025
Appellant's Reply Brief	August 1, 2025

2. The circumstances described herein present compelling reasons for modifying the briefing schedule.

3. The extension requested is to allow for the time needed to adequately prepare Appellant's Initial Brief and the Appendix.

4. Appellant's counsel is still working with Court Reporters on certain trial transcripts relating to the Government's expert witnesses that have not been previously transcribed or produced.

5. Appellant's counsel is consulting with a third parties regarding the contribution of Amici Briefs. Some third parties have expressed concerns about the tight turn around for their work product and have encouraged us to seek a modification the briefing schedule.

6. Appellant's counsel is working on securing fundraising for appellate costs.

7. Appellant's counsel has not yet been able to gain full attorney-client access to Mr. Sterlingov at his current detention facility.

8. Appellant's counsel has a two-week criminal trial that is currently scheduled to begin March 24, 2025.

9. A member of Appellant's legal team has multiple lengthy substantive filings due in a handful of cases in the weeks immediately surrounding the current date for Appellant's Initial Brief and the Appendix. The lengthy submissions include all of the pretrial filings in a complex multi-codefendant case with a trial that begins at the beginning of May 2025 and is expected to last three to four weeks.

10. This motion is made in good faith and not for the purpose of undue delay. The proposed schedule and format will not substantially delay proceedings in this case and will not prejudice any party. There is good cause to enter the proposed briefing schedule.

11. Appellant's counsel has conferred with the Government, and the Government consents to the proposed modification of the briefing schedule.

WHEREFORE, Appellant Sterlingov respectfully requests this Honorable Court enter an order modifying the briefing schedule as proposed here.

Dated: March 11, 2025
Respectfully submitted,

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*Counsel for Appellant,
Roman Sterlingov*

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 32(g), I hereby certify that this motion complies with the type-volume limitations of Federal Rule of Appellate Procedure 27(d)(2)(A), as the motion was prepared using the size and style of type of 14-point Times New Roman and contains 389 words, excluding the parts of the motion exempted by Federal Rule of Appellate Procedure 32(f). This motion complies with the privacy redaction requirement of Federal Rule of Appellate Procedure 25(a) because it contains no personal data identifiers.

Dated: March 11, 2025

Respectfully submitted,

/s/ Tor Ekeland
Tor Ekeland

CERTIFICATE OF SERVICE

I hereby certify that, on March 11, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the D.C. Circuit by using the CM/ECF system which will serve a notice of electronic filing on counsel of record.

Respectfully submitted,

/s/ Tor Ekeland
Tor Ekeland